

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

CHRISTOPHER BARBOUR,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 2:01-cv-612-ECM
	)	
JOHN HAMM, Commissioner,	)	
Department of Corrections,	)	
et al.,	)	
	)	
Respondents.	)	

**RESPONDENTS' MOTION TO TRANSPORT**

Come now Respondents, by and through the Attorney General for the State of Alabama, and respectfully move this Court to order that Jerry Tyrone Jackson be transported to attend the evidentiary hearing on June 29–30, 2023, based on the following grounds:

1. Barbour has accused Mr. Jackson of the capital murder of Mrs. Thelma Roberts. (*See* Doc. 349 ¶ 96 (“The sole source of semen found on Mrs. Roberts’ body was Jerry Tyrone Jackson . . . [who wa]s the only person unrelated to Mrs. Roberts whose DNA was found at the crime scene . . . [and] is currently serving a life sentence for the murder of . . . another Alabama woman. These findings confirm

. . . that . . . Jackson[] was her killer.”<sup>1</sup>). This Court appointed Mr. Jackson counsel on May 21, 2023. (Doc. 353.)

2. Mr. Jackson has potentially become a material witness in this case. As such, Respondents have listed Mr. Jackson as a witness on their witness list. (Doc. 368.)

3. Mr. Jackson (AIS # 230209) is currently incarcerated at the Limestone Correctional Center.

Wherefore, based on the above, Respondents respectfully request that this Court order that Mr. Jackson be transported to attend the evidentiary hearing on June 29–30, 2023.

Respectfully submitted,

Steve Marshall (MAR083)

*Attorney General*

By:

s/Audrey Jordan

Audrey Jordan

*Assistant Attorney General*

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1. Respondents deny this allegation.

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of June 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will provide notification of such filing to the following CM/ECF participants: **George Kendall, Samuel Spital, Nicola Cohen, Santino Coleman, Carine Williams, Theodore Michael Shaw, and Miriam Gohara.**

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